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July 6, 2022

Via ECF and E-Mail

Hon. Andrew L. Carter  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request permission for Mr. Oberholzer to travel to San Francisco, California, for a one-day business trip where he will be attending a flight display of a helicopter being sold to one of his clients, leaving and returning on July 15, 2022, and to Denver, Colorado, for a one-day business trip where he will be attending a meeting, leaving and returning on July 27, 2022.

Pretrial Services, by PTSO Dominique Jackson, takes no position on Mr. Oberholzer's application. The government, by AUSA Jilan Kamal, has no objection to Mr. Oberholzer's application. If approved, Mr. Oberholzer would purchase the tickets and provide Pretrial Services with an itinerary of his trip. By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release.

We thank the Court for its consideration in this matter.

Hon. Andrew L. Carter  
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Respectfully submitted,

*/s/ Ryan P. Poscablo*

Ryan P. Poscablo, Esq.

cc: Jilan Kamal, Esq., Assistant United States Attorney (by ECF)  
Dominique Jackson, Pretrial Services (by email)

*Andrew L. Carter Jr.*  
So Ordered:  
Hon. Andrew L. Carter, Jr. *7-7-22*